

EXHIBIT 1

From: [Rich Ramirez](#)
To: [Carroll, Schuyler](#)
Cc: [Andrew K. Glenn](#)
Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS
Date: Thursday, June 27, 2024 11:29:29 AM
Attachments: [image001.jpg](#)
[image002.png](#)

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I am in Court tomorrow morning through tomorrow afternoon. We can send you our requests Monday; we don't expect to have many.

Please copy us on the email to Chambers requesting that the hearing be adjourned.

--

Rich Ramirez
W: 212.970.1624
rramirez@glennagre.com



1185 Avenue of the Americas
New York, NY 10036

From: Carroll, Schuyler <SCarroll@manatt.com>
Sent: Thursday, June 27, 2024 11:04 AM
To: Rich Ramirez <rramirez@glennagre.com>
Cc: Andrew K. Glenn <aglenn@glennagre.com>
Subject: Re: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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Since we have not received it yet, we have no idea what will be requested.

Schuyler Carroll
Partner

Manatt, Phelps & Phillips, LLP
7 Times Square
New York, NY 10036
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SCarroll@manatt.com

manatt.com

From: Rich Ramirez <rramirez@glennagre.com>
Sent: Thursday, June 27, 2024 10:58:57 AM
To: Carroll, Schuyler <SCarroll@manatt.com>
Cc: Andrew K. Glenn <aglenn@glennagre.com>
Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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Schuyler, what do you mean by “subject to review of your document request”?

--

Rich Ramirez
W: 212.970.1624
rramirez@glennagre.com



1185 Avenue of the Americas
New York, NY 10036

From: Carroll, Schuyler <SCarroll@manatt.com>
Sent: Thursday, June 27, 2024 10:50 AM
To: Rich Ramirez <rramirez@glennagre.com>
Cc: Andrew K. Glenn <aglenn@glennagre.com>
Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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That is acceptable subject to review of your document request and receipt of your document request by no later than us before noon tomorrow.

Schuyler Carroll
Partner

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From: Rich Ramirez <rramirez@glennagre.com>

Sent: Thursday, June 27, 2024 9:14 AM

To: Carroll, Schuyler <SCarroll@manatt.com>

Cc: Andrew K. Glenn <aglenn@glennagre.com>

Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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Schuyler, are we good on this schedule? I ask because the extension to object to the fee app for the US Trustee and the Reorganized Debtor runs through today. We should give Mark a heads up that we have an agreed schedule and are adjourning the hearing.

Thanks,

--

Rich Ramirez

W: 212.970.1624

rramirez@glennagre.com



1185 Avenue of the Americas
New York, NY 10036

From: Rich Ramirez

Sent: Wednesday, June 26, 2024 1:35 PM

To: Carroll, Schuyler <SCarroll@manatt.com>

Cc: Andrew K. Glenn <aglenn@glennagre.com>

Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

Thanks, Schuyler. We can agree to this schedule, with the one addition below in red. We anticipate sending our discovery requests over the next couple of days.

- July 12 - Debtor's deadline to produce documents
- **July 19 – Branton's deadline to produce documents**
- August 9 - Discovery concludes
- August 27 - Debtor's objection due
- September 10 – Branton reply due
- September 16 – Hearing – subject to the court availability

If this is agreeable, will you please send us a proposed scheduling stip?

--

Rich Ramirez

W: 212.970.1624

rramirez@glennagre.com



1185 Avenue of the Americas
New York, NY 10036

From: Carroll, Schuyler <SCarroll@manatt.com>

Sent: Wednesday, June 26, 2024 11:12 AM

To: Rich Ramirez <rramirez@glennagre.com>

Cc: Andrew K. Glenn <aglenn@glennagre.com>

Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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We are prepared to agree to near the same schedule you proposed, but cannot do the same dates due to conflicts. Our agreement, however, is conditioned on a deadline for the debtor to produce documents. This deadline still gives you more than two weeks, so it really should not be a problem.

July 12 - Debtor's deadline to produce documents

August 9 - Discovery concludes

August 27 - Debtor's objection due

September 10 – Branton reply due

September 16 – Hearing – subject to the court availability

Schuyler Carroll

Partner

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From: Rich Ramirez <rramirez@glennagre.com>

Sent: Wednesday, June 26, 2024 9:55 AM

To: Carroll, Schuyler <SCarroll@manatt.com>

Cc: Andrew K. Glenn <aglenn@glennagre.com>

Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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Schuyler, when can we expect a response from you on our scheduling proposal below?

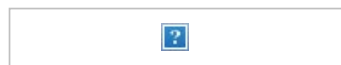
Thanks,

--

Rich Ramirez

W: 212.970.1624

rramirez@glennagre.com



1185 Avenue of the Americas
New York, NY 10036

From: Rich Ramirez

Sent: Monday, June 24, 2024 11:31 AM

To: Carroll, Schuyler <SCarroll@manatt.com>

Cc: Andrew K. Glenn <aglenn@glennagre.com>

Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

Schuyler,

We've discussed your proposed schedule with our clients. Please see below for our revised dates. Due to scheduling conflicts on our end between now and the week of August 5, in addition to the need to accommodate third-party discovery and summer vacations, we do not believe a full evidentiary hearing is possible in your proposed time frame. Our goal is to give us more flexibility.

If these dates are acceptable, will you please circulate a scheduling motion and proposed order reflecting the same? We request that the order provide that, in addition to the proposed dates below, the discovery rules applicable to adversary proceedings will apply to this contested matter.

September 6	Discovery Concludes
September 13	Objections Due
September 20	Branton Reply Due
September 26 (subject to the Court's availability)	Hearing

--

Rich Ramirez

W: 212.970.1624

rramirez@glennagre.com



1185 Avenue of the Americas
New York, NY 10036

From: Rich Ramirez <rramirez@glennagre.com>
Sent: Saturday, June 22, 2024 12:03 PM
To: Carroll, Schuyler <SCarroll@manatt.com>; Andrew K. Glenn <aglenn@glennagre.com>
Subject: Re: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

Schuyler, we're still discussing with our client and hope to have an answer back to you over the weekend or early next week.

Thanks,

Rich Ramirez
W: [212.970.1624](tel:212.970.1624)
rramirez@glennagre.com

Glenn Agre Bergman & Fuentes LLP
1185 Avenue of the Americas, 22nd Floor
New York, NY 10036

From: Carroll, Schuyler <SCarroll@manatt.com>
Sent: Friday, June 21, 2024 3:25:51 PM
To: Rich Ramirez <rramirez@glennagre.com>; Andrew K. Glenn <aglenn@glennagre.com>
Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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Please let me know if the schedule I proposed is acceptable and your response to what else you want. Thank you.

Schuyler Carroll
Partner

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From: Rich Ramirez <rramirez@glennagre.com>

Sent: Thursday, June 20, 2024 3:14 PM

To: Carroll, Schuyler <SCarroll@manatt.com>; Andrew K. Glenn <aglenn@glennagre.com>

Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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Thanks Schuyler, we're discussing with the client and will be back in touch shortly. In the meantime, we should inform the US Trustee that the hearing will be postponed as a courtesy given the noticed objection deadline. Let me know if you would prefer to send that email with us copied.

Also, not sure what you mean by "what you want besides discovery." What are you referring to?

Rich

--

Rich Ramirez

W: 212.970.1624

rramirez@glennagre.com



1185 Avenue of the Americas
New York, NY 10036

From: Carroll, Schuyler <SCarroll@manatt.com>

Sent: Thursday, June 20, 2024 10:50 AM

To: Rich Ramirez <rramirez@glennagre.com>; Andrew K. Glenn <aglenn@glennagre.com>

Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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July 19 - Discovery concludes

July 26 - Debtor's objection due

August 2 – Branton reply due

August 8 – Hearing – the court previously told me this date is available

We still need to hear from you as to what you want besides discovery.

Schuyler Carroll
Partner

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From: Rich Ramirez <rramirez@glennagre.com>
Sent: Thursday, June 20, 2024 10:16 AM
To: Carroll, Schuyler <SCarroll@manatt.com>; Andrew K. Glenn <aglenn@glennagre.com>
Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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Schuyler, following up on the proposed schedule. Your RFPs set a deadline of noon today; please confirm that all discovery and objection deadlines are at a standstill pending hammering out the new schedule.

Thanks,

--

Rich Ramirez
W: 212.970.1624
rramirez@glennagre.com



1185 Avenue of the Americas
New York, NY 10036

From: Carroll, Schuyler <SCarroll@manatt.com>
Sent: Wednesday, June 19, 2024 10:26 AM
To: Rich Ramirez <rramirez@glennagre.com>; Andrew K. Glenn <aglenn@glennagre.com>
Subject: Re: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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I should be able to get back to you later today, if not certainly tomorrow. How about you?

Schuyler Carroll

Partner

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New York, NY 10036

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SCarroll@manatt.com

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From: Rich Ramirez <rramirez@glennagre.com>

Sent: Wednesday, June 19, 2024 10:24:20 AM

To: Carroll, Schuyler <SCarroll@manatt.com>; Andrew K. Glenn <aglenn@glennagre.com>

Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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Schuyler, thanks for the call yesterday. Please let us know when we may expect your scheduling proposal. The US Trustee has asked that the Reorganized Debtor keep him in the loop on this fee application; we should let him know ASAP that the July 2 hearing will be continued to a later date.

Thanks,

--

Rich Ramirez

W: 212.970.1624

rramirez@glennagre.com



1185 Avenue of the Americas

New York, NY 10036

From: Rich Ramirez

Sent: Tuesday, June 18, 2024 8:21 AM

To: Carroll, Schuyler <SCarroll@manatt.com>; Andrew K. Glenn <aglenn@glennagre.com>

Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

Thanks. I just circulated a Zoom for 3:30pm.

--

Rich Ramirez

W: 212.970.1624

rramirez@glennagre.com



1185 Avenue of the Americas
New York, NY 10036

From: Carroll, Schuyler <SCarroll@manatt.com>

Sent: Tuesday, June 18, 2024 8:03 AM

To: Rich Ramirez <rramirez@glennagre.com>; Andrew K. Glenn <aglenn@glennagre.com>

Subject: Re: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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I am free from 1-4

Schuyler Carroll

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SCarroll@manatt.com

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From: Rich Ramirez <rramirez@glennagre.com>

Sent: Monday, June 17, 2024 7:42:46 PM

To: Andrew K. Glenn <aglenn@glennagre.com>; Carroll, Schuyler <SCarroll@manatt.com>

Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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Schuyler, what time windows work for you to connect tomorrow?

Thanks,

--

Rich Ramirez

W: 212.970.1624

rramirez@glennagre.com



1185 Avenue of the Americas
New York, NY 10036

From: Andrew K. Glenn <aglenn@glennagre.com>
Sent: Monday, June 17, 2024 11:31 AM
To: Carroll, Schuyler <SCarroll@manatt.com>
Cc: Rich Ramirez <rramirez@glennagre.com>
Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

I'm free for the next hour, then after 4:30.

Andrew K. Glenn
Managing Partner
aglenn@glennagre.com
W: (212) 970-1601
M: (908) 581-3659

1185 Avenue of the Americas
New York, NY 10036

From: Carroll, Schuyler <SCarroll@manatt.com>
Sent: Monday, June 17, 2024 9:54 AM
To: Andrew K. Glenn <aglenn@glennagre.com>
Cc: Rich Ramirez <rramirez@glennagre.com>
Subject: Re: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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Just called you. When are you available today?

Schuyler Carroll
Partner

Manatt, Phelps & Phillips, LLP
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New York, NY 10036
D (212) 790-4521 **M** (917) 302-6464
SCarroll@manatt.com

From: Andrew K. Glenn <aglenn@glennagre.com>

Sent: Friday, June 14, 2024 12:56:09 PM

To: Carroll, Schuyler <SCarroll@manatt.com>

Cc: Rich Ramirez <rramirez@glennagre.com>

Subject: Re: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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I'm available for the next hour, then out of pocket for the remainder of the day. Let me know if you are free.

Andrew K. Glenn
Managing Partner
aglenn@glennagre.com
W: (212) 970-1601
M: (908) 581-3659

1185 Avenue of the Americas
New York, NY 10036

From: Carroll, Schuyler <SCarroll@manatt.com>

Sent: Friday, June 14, 2024 6:15 AM

To: Andrew K. Glenn <aglenn@glennagre.com>

Subject: RE: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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Thanks for the letter. Are you available at 11 this morning?

Schuyler Carroll
Partner

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From: Rich Ramirez <rramirez@glennagre.com>
Sent: Thursday, June 13, 2024 11:12 PM
To: joshua@joshuastein.com; Carroll, Schuyler <SCarroll@manatt.com>
Cc: Andrew K. Glenn <aglenn@glennagre.com>; Naznen Rahman <NRahman@glennagre.com>
Subject: In re Ninety-Five Madison Company, L.P., Case No. 21-10529 (DJS) // Letter to BRS

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Counsel:

On behalf of Andrew K. Glenn, please see the attached correspondence.

Regards,

--

Rich Ramirez
W: 212.970.1624
rramirez@glennagre.com



1185 Avenue of the Americas
New York, NY 10036

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